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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: ROUNDUP PRODUCTS LIABILITY
LITIGATION

MDL No. 2741

Case No. 3:19-cv-03566

This document relates to:

DONALD BITTINGER, JR., *et al.*,
Plaintiffs,

v.

MONSANTO COMPANY,
Defendant.

**JOINT STIPULATION REGARDING
REMAND**

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JOINT STIPULATION REGARDING REMAND

WHEREAS, Plaintiffs first filed their case against Defendant Monsanto Company in the 22nd Judicial Circuit Court for the City of St. Louis, Missouri, on April 26, 2019, in *Bittinger, Jr., et al. v. Monsanto Co.*, No. 1922-CC00850 (Mo. Cir. Ct. St. Louis City), alleging that exposure to Monsanto Company's Roundup caused them to develop Non-Hodgkin Lymphoma;

WHEREAS, Monsanto removed the action on June 3, 2019, on the bases of federal question and federal enclave jurisdiction, arguing that Plaintiff Manuel Colon allegedly was exposed to Roundup on federal enclave property; and

WHEREAS, Monsanto agrees in its Notice of Removal that "the Court should order severance and remand to state court the severed claims of the other plaintiffs who do not allege injuries arising from exposures to Roundup®-branded products on federal enclaves – and therefore do not fall within this Court's original federal question jurisdiction";

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Defendant, by and through their respective counsel, that:

1. Plaintiffs and Defendant request that the Court enter the proposed order to sever all cases and remand the severed Plaintiffs, other than Plaintiff Colon, in the above-captioned lawsuit to state court for further proceedings; and
2. By virtue of this stipulation, Plaintiff Manuel Colon does not waive his right to challenge the removal of his case from state court on the basis of federal question and federal enclave jurisdiction.

Dated: August 20, 2019

WEITZ & LUXENBERG PC

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